

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ACTION CAPITAL PROPERTIES, LLLP, et al.,)	
)	
<i>Plaintiffs,</i>)	Case No. 19-1784L
)	
v.)	Hon. Lydia Kay Griggsby
)	
THE UNITED STATES OF AMERICA,)	(E-Filed March 26, 2021)
)	
<i>Defendant.</i>)	

**NOTICE OF PLAINTIFFS' ACCEPTANCE OF THE UNITED STATES' RCFC 68
OFFER OF JUDGMENT**

Pursuant to RCFC 68(a), the United States files this Notice informing the Court that Plaintiffs have accepted the United States' January 14, 2021, Offer of Judgment. The Offer of Judgment is attached as Exhibit A. The acceptance of the Offer of Judgment by Plaintiffs is reflected in an email from Plaintiffs' counsel to counsel for the United States, dated January 21, 2021. The email is attached as Exhibit B.¹

In accordance with RCFC 68 and the accepted Offer of Judgment, the United States requests that the Court direct the entry of judgment under RCFC 54(b) as to Plaintiffs' claims in the amounts specified in the Offer of Judgment. The Offer of Judgment resolves all just compensation, exclusive of interest, and encompasses any and all claims for damages and just compensation which were alleged or could have been alleged by Plaintiffs in this action. The United States and Plaintiffs have entered into a settlement agreement concerning interest, costs, expenses, and attorney's fees. Following the Court's entry of judgment, the United States will pay Plaintiffs in accordance with the Offer of Judgment and settlement agreement.

¹ The email documenting Plaintiffs' acceptance of the Offer of Judgment has been redacted to remove materials subject to Fed. R. Evid. 408.

Respectfully submitted this 26th day of March, 2021.

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